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October 1, 2015

VIA ECF

Honorable Vernon S. Broderick
United States District Judge
for the Southern District of New York
40 Foley Square
New York, NY 10007-1312

Re: *In re: Hornbeam*, 14 Misc 424

Dear Judge Broderick:

We represent intervenor Panikos Symeou (“Symeou”) in the above-titled action, and write jointly with counsel for Hornbeam Corporation (“Hornbeam”) to respectfully request a brief extension of a deadline set forth in the Court’s September 17, 2015 Order (the “Order”), as extended by the Court’s September 24, 2015 Order.

The Order directed the parties to provide the Court with a proposed amended protective order, a letter agreeing to extend the current protective order, or a joint letter setting out the parties’ respective protective orders, no later than September 24, 2015. The Order further directed Hornbeam to provide Symeou with all Responsive Materials by October 1, 2015. On September 24, 2015, upon the parties’ request, the Court extended the respective deadlines to September 30, 2015 to respond respecting the protective order, and to October 7, 2015 for Hornbeam to produce the Responsive Materials.

The parties have been negotiating in good faith, and have been unable to reach a resolution. Moreover, many of the counsel will be in Alabama through Friday for a related hearing. As such, the parties seek to extend the deadline respecting the protective order to October 6, 2015. Hornbeam does not seek to extend its deadline to produce the Responsive Materials beyond October 7, 2015.

This is the parties’ second request for an extension of the deadlines in the Court’s Order.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Steven Cooper

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Cc: James H. Power